

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 24-20037-civ-MARTINEZ

GOPRO, INC.,  
Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED  
LIABILITY COMPANIES, PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS IDENTIFIED  
ON SCHEDULE A,  
Defendants.

---

**PLAINTIFF’S MOTION TO UNSEAL**

Plaintiff GOPRO, INC. (“Plaintiff”), by and through its undersigned counsel, hereby moves this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket and returning all portions of the Court file to the public records. As grounds therefore, Plaintiff states:

1. On January 5, 2024, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Including a Temporary Injunction, a Temporary Transfer of the Defendant Internet Stores, a Temporary Asset Restraint, and Expedited Discovery, together with the supporting Declarations and Exhibits (the “*Ex Parte* Motion for TRO”) [DE 5], pursuant to Local Rule 5.4(d), which requires, unless the Court directs otherwise, *ex parte* filings be restricted from public view. That same day Plaintiff also filed its *Ex Parte* Motion for Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) and Memorandum of Law in Support Thereof (the “*Ex Parte* Motion for Alternate Service”) [DE 6].

2. On May 23, 2024, the Court issued a Sealed Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order (the “Sealed Temporary Restraining Order”), and a Sealed Order Authorizing Alternative Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3)(the “Sealed Alternate Service Order”) [DE 17-18]. Upon receipt, on May 28, 2024, Plaintiff served the Sealed Temporary Restraining Order on the requisite financial institutions to restrain Defendants’ financial accounts at issue.

3. Plaintiff has confirmed the restraints of Defendants’ accounts and has served the Complaint, Summons, Sealed Temporary Restraining Order, and all relevant pleadings and filings in this matter on each Defendant in this action by: (1) providing the address to Plaintiff’s designated Serving Notice Website to Defendants via e-mail to the e-mail accounts provided by the e-commerce platform associated with each of the Defendant Internet Stores, and (2) posting a copy of all documents filed in this matter at the URL <http://gopro-cases.com/case-24-cv-20037.html>.

4. As a seal on this matter is no longer required, Plaintiff respectfully requests this matter be unsealed and the portions of the docket relating to Plaintiff’s *Ex Parte* filings together with all other documents that have been restricted from the Court docket, be returned to the public portions of the Court file.

WHEREFORE, Plaintiff respectfully requests this Court issue an Order unsealing all documents filed with the Court that have been restricted from the Court docket and direct the Clerk to return those portions of the Court file to the public records.

Dated: November 13, 2024

Respectfully submitted,

**BOIES SCHILLER FLEXNER LLP**

/s/ Leigh Salomon

Leigh Salomon (FL Bar No. 1054106)

100 SE 2<sup>nd</sup> Street

Suite 2800

Miami, FL 33131

Tel: (305) 539-8400

lsalomon@bsfllp.com

***Attorney for Plaintiff GOPRO, INC.***